

**Department of Health and Mental Hygiene  
Information Resources Management Administration  
Data Eradication Guidelines**

The Department of Health and Mental Hygiene (DHMH) data eradication guidelines direct the removal or destruction of all data from magnetic and other storage media within the Department of Health and Mental Hygiene (DHMH). The guidelines were prepared to prevent possible protected data disclosure due to incomplete erasure of DHMH data storage media, to help protect DHMH organizations and staff from the liabilities associated with the necessary use of this data, and to satisfy internal and legislative audit requirements. It is assumed that all DHMH data storage media could contain identifiable client-related data. Proceeding in this manner, the Department intends to provide uniform protection of its protected or proprietary information, and to minimize the potential liability of DHMH for any inappropriate disclosure of such data. The guidelines are updated periodically to reflect current practices and experience. They are to be used whenever computer equipment and the fixed, or removable, media are transferred from one organization (or user) to another, when the equipment is declared surplus, and when organizations dispose of media as described below. All items of property must be disposed of in a manner consistent with Department of General Services guidelines and Department of Health and Mental Hygiene guidelines as delineated in the “DGS INVENTORY CONTROL MANUAL”.

Media addressed in these guidelines includes fixed and removable hard drives, cartridge and open reel tapes, floppy disks, CD-ROMs, fax machine and copy machine ribbons, as well as cell phones, PDA’s and related devices that can retain data and information. This includes computers and/or media located at headquarters sites, local health departments and DHMH facilities. It also includes computers and/or media owned by vendors or business partners or placed at vendor sites or business partner sites that ever contained DHMH protected or proprietary data. The Information Assurance Policy and security rules associated with DHMH data apply equally to those personnel and/or organizations who service the aforementioned computers and/or media. As a regular course of business, computers and/or media should be labeled to identify in a discreet but positive way that protected or proprietary data as defined in DHMH 02.01.06, Information Assurance Policy, is present, or has been present, on the device. This distinctive marking helps to avoid improper handling, but must be removed prior to disposal.

The Information Resources Management Administration (IRMA) provides standards, leadership, direction and customer service in the data eradication process. It also can assist in the training of DHMH administrative and technical personnel in the performance of the data eradication procedures, as well as, their participation in the overall data eradication process. Each DHMH Business unit is responsible for performing the data eradication procedures on the computers and/or media under their control that are transferred to a new user within their own jurisdiction. When transferring any of the aforementioned media to a different user, it is recommended that any hard drives be cleaned with a software program that conforms to federal guidelines for data eradication. Otherwise, hard drives and “other media” such as floppy disks, CD-ROMs, fax machine

and copy machine ribbons, zip disks, etc. should be taken by the DHMH Business Units to certain designated pickup points throughout the State Of Maryland.

The DHMH Business Unit Staff will remove storage media from their excess computers and deliver the storage media, with the form "Certification of Transfer of Equipment Containing Data to be Eradicated", to the designated pickup points. The media must be put into labeled containers at the designated pickup points. DHMH Central Services, or the DHMH Business Unit, will deliver the remaining computer parts to the State Surplus warehouse at Jessup as excess property. A detailed Audit Trail should be maintained. Excess Property Inventory Documentation should be forwarded to:

Ralph Clark  
Administrator  
201 West Preston Street, Room LL-4  
Baltimore, MD 21201  
(410)767-5305

Facilities and Local Health Departments should process (state-owned) excess property according to the guidelines in the "DGS INVENTORY CONTROL MANUAL".

A certification form itemizing the type of storage media is included with these procedures. One copy of the above-mentioned documents should be left at the pickup point with the media for the Vendor and one copy should be maintained in the DHMH Business Unit Inventory File for the regular retention period.

A detailed working procedure will accompany these guidelines. This procedure will explain how to handle the different types of media, the DHMH Designated Data Eradication Vendor's role in this process and how to maintain the various documents in the Audit Trail. A separate procedure for the handling of used cellphones, pagers, PDA's and other such media will be written and submitted to the HICC Council for approval, in the near future.

Contact Bob Branan in IRMA at 410-767-5082 regarding any technical questions or concerns, or general guidance. Other questions concerning the actual property should be directed to the Business Unit's property accountable officer.

(Revised, July, 2004)

### Certification of Transfer of Equipment Containing Data to be Eradicated

**Items covered:** use this form to document the transfer of desktop computers, laptop computers, magnetic storage media and other types of storage media.

**Items exempted from this eradication procedure:** mainframe computers and storage media, and electronic computer equipment and/or components that are not used to store data, cell phones, PDA's, miniature memory devices (ex. Key fobs, cards, etc.)

Equipment processed in this batch: (list each item separately)

[illegible]

All DHMH administrations, DHMH facilities and local health departments are responsible for assuring compliance with this procedure.

Business Unit Name: \_\_\_\_\_  
☐ administration   ☐ facility   ☐ local health department   ☐ other \_\_\_\_\_

Date Completed: \_\_\_\_\_ Form Completed by: \_\_\_\_\_  
Telephone #: \_\_\_\_\_ E-mail Address: \_\_\_\_\_

Transfer Certification: \_\_\_\_\_ Date: \_\_\_\_\_

Signature of property accountable officer